

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

MARC VEASEY et al.,	§	
<i>Plaintiffs,</i>	§	
	§	Civil Action No. 2:13-cv-193 (NGR)
v.	§	
	§	
GREG ABBOTT, et al.,	§	
<i>Defendants,</i>	§	

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**DEFENDANTS' RESPONSE TO PRIVATE PLAINTIFFS' UNOPPOSED MOTIONS  
FOR ATTORNEYS' FEES INCURRED ON APPEAL**

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As Plaintiffs have described in their filings, Defendants engaged in good faith negotiations with Plaintiffs in an effort to resolve the dispute regarding appellate attorneys' fees without the need for further litigation. Defendants do not oppose awards of attorneys' fees in the total amounts that each Plaintiff group has requested for the work performed on appeal. However, neither Defendants nor the Office of Attorney General agree to (1) the propriety of any of Plaintiffs' counsel's suggested hourly rates or (2) the reasonableness or necessity of any particular hours that were expended in connection with the appeal. Defendants have agreed only not to oppose the motions for the requested total amounts for the sole purpose of resolving this discrete issue in this litigation, and Defendants and the State reserve all other rights.

Respectfully submitted.

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**COUNSEL FOR THE STATE DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 18, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all registered CM/ECF users.

/s/ Christopher D. Hilton  
CHRISTOPHER D. HILTON